

UNITED STATES DISTRICT COURT

District of Massachusetts
1 courthouse way, suite 2300
Boston, Massachusetts. 02210
617-748-9152

Rashid Jahm
Pro se
Plaintiff

Case No:05CV11638-JLT
Jury Trial Demanded

Vs

George L. McCarger (P45588) and Stephen C. Bransdorfer (P11133)
161 Ottawa Ave. N.W. Ste 411-S
Grand Rapids, MI. 49503-2898
Phone:(616) 774-8422
Defendant- Appellant

Plaintiff Answer to Defendant George McCarger with Proof

1. This is a federal civil rights action pursuant to 42 U.S.C. § 1983 and § 1988, and the federal constitutional provisions and statutes referred to herein, by all the above names mentions, as defendants are Michigan State employees and Others including defendant attorney Craig Noland (P30717), and including insurance companies together has conspire against plaintiff.

Jurisdiction of this action is based upon federal question jurisdiction pursuant to Title 28, United States Code, Sections 1331, 1331(a) and the Due Process Clause of Art. IV of the United States Constitution.

This court has jurisdiction over plaintiff's common law claims, infra, and venue is proper pursuant to Title 28, United States Code, Section 1391. The issue before this court is the violation of the Plaintiff's civil

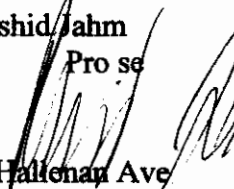
rights pursuant to Title 42 U. S. C. § 1983 and 1985(2) and raises

federal questions and constitutional issues. Plaintiff contends that

Defendant George McCarger knew that Craig Noland has load picture of the scene on a CD, destroyed document but still George cover up to conspired with his Client to undermine the Plaintiff's right and promote Craig Noland act.

2. Defendant George McCarger Received CD from Craig Noland. See EXHIBIT (A) Page – 1
3. Defendant George got advise related to dispatch of which response instead defendant Craig Noland advise him no such document exist. Craig Noland has to answer what happen to that document? See EXHIBIT (A) Page- 2
4. Defendant George did Breach of contract and violation of professional ethics. Plaintiff request to Honorable Court for jury trial, discovery.

Dated: February 06, 2006

Rashid Jahm
Pro se

49 Hallenay Ave
Lawrence, MA 01841
(978) 258-9419

Document mailed by us postal to all
Patrick Dolan
Thomas R. Meagher Pro Hac Vice
John A. Christopher
Judy E. Bregman Pro Hac Vice
Stephen J. Duggan
Juliana deHaan rice
Mark E. Donnelly (P39281) Pro Hac Vice
George L. McCarger
Robert P. Powers,

Mr. Craig R. Noland
July 15, 2002
Page 2

Please advise us if the Supplemental Answers and related documents which we have provided satisfy the Motion to Enforce Discovery which is scheduled for hearing on July 19, 2002, or if you intend to proceed with that Motion.

In addition, please advise us as to whether the CD you provided, which contains the pictures of the accident scene, is ~~the original recording medium for the photographs. As far as I~~ know, there are no cameras that record directly to a CD. If the pictures were taken on a digital camera, ~~they would be originally recorded on a "card" or disc that could be used with a computer~~ to produce the actual photo copies. If the pictures were taken on an "old fashion" film camera, then the original recording medium would be the film negatives. The images from the negatives can be transferred to a CD. Accordingly, please let us know if there are either film negatives or a digital camera "card" or disc, from which the images were transferred to the CD you provided.

Sincerely,
BRANSDORFER & RUSSELL, LLP



George L. McCargar

Enc:
Cc; Mr. Rashid Jahm

BRANSDORFER & RUSSELL, LLP

BRANSDORFER & RUSSELL, P.C.
RECEIVED BY: _____ ON: _____
ORIGINAL TO: _____
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June 28, 2001

Mr. Craig R. Noland
Smith Haughey Rice & Roegge, PC
200 Calder Plaza Building
250 Monroe Ave., NW
Grand Rapids, MI 49503

Re: Rashid A. Jahm v. City of Walker et al
Case No.: 00-08794-NI

Dear Craig:

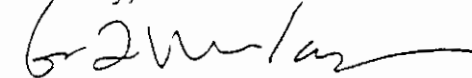
This letter confirms our June 28, 2001, telephone conversation regarding the above referenced case. As discussed, you have agreed to stipulate to the filing of the Second Amended Complaint alleging a closed head injury. You have also agreed to file Amended Answers to Plaintiff's Requests for Admissions, which admit Request No. 2 and which comply with rule MCR 2.312 (B)(3) regarding Request No. 3.

With regard to our request for documents relating to the dispatch to which Mr. Kars was responding at the time of the collision, this letter also confirms that you advised us no such documents exist.

Enclosed please find Plaintiff's Second Set of Interrogatories to Defendants.

Please contact us if this letter does not set forth your understanding regarding the filing of the Second Amended Complaint, Amended Answers to Plaintiff's Request for Admissions and Plaintiff's request for documents relating to the dispatch.

Sincerely,



George L. McCargar, III

GLM/mls